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LEWIS BRISBOIS BISGAARD & SMITH LLP  
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Las Vegas, Nevada 89118  
7 702.893.3383  
FAX: 702.893.3789  
8 *Attorneys for Defendant State Farm Mutual*  
*Automobile Insurance Company*

9  
10 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA, SOUTHERN DIVISION**

11 \*\*\*

12 ROSE DESIO,  
13 Plaintiff,  
14 vs.  
15 STATE FARM MUTUAL AUTOMOBILE  
16 INSURANCE COMPANY; DOES I-V and  
17 ROES VI-X, inclusive  
18 Defendants.

CASE NO. 2:20-cv-1486-APG-NJK

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
RESPONSE TO PLAINTIFF'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

19 DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY  
20 ("Defendant"), by and through its counsel of record, the law firm of LEWIS BRISBOIS  
21 BISGAARD & SMITH LLP, and PLAINTIFF ROSE DESIO ("Plaintiff"), by and through her  
22 counsel of record, JESSE SBAIH & ASSOCIATES, LTD., hereby stipulate and agree that the  
23 time for Defendant to file its Response to Plaintiff's Motion for Partial Summary Judgment be  
24 extended as set forth herein. Defendant State Farm's Response is currently due December 9,  
25 2020. The parties hereby stipulate that the due date for Defendant's Response be extended to  
26 December 16, 2020.

27 **Reason for Extension**

28 Plaintiff's Motion for Partial Summary Judgment addresses a nuanced issue of law

1 regarding the enforceability of Defendant's anti-stacking provision in the Nevada Car Policy it  
2 issued to Plaintiff. Defendant requires additional time to address Plaintiff's claims effectively  
3 prior to filing its Response. This stipulation is made in good faith and not for the purpose of  
4 delay.

5 This is the first extension of time requested for filing Defendant's Response to Plaintiff's  
6 Motion for Partial Summary Judgment.

7 DATED this 30<sup>th</sup> day of November, 2020.

DATED this 30<sup>th</sup> day of November, 2020.

8 LEWIS BRISBOIS BISGAARD & SMITH

JESSE SBAIH & ASSOCIATES, LTD.

9 /s/ Tara U. Teegarden

/s/ Jesse M. Sbaih

10 ROBERT W. FREEMAN  
Nevada Bar No. 3062

JESSE M. SBAIH

11 CHERYL A. GRAMES  
Nevada Bar No. 12752

Nevada Bar No. 7898

12 TARA U. TEEGARDEN  
Nevada Bar No. 15344

INES OLEVIC-SALEH

13 6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118

Nevada Bar No. 11431

14 Attorneys for Defendant

The District at Green Valley Ranch  
170 South Green Valley Parkway, Suite 280  
Henderson, Nevada 89012

Attorneys for Plaintiff

15  
16 **ORDER**

17 IT IS SO ORDERED.

18 Dated this 1st day of December, 2020.

19  
20   
U.S. DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 30<sup>th</sup> day of November, 2020, I electronically filed the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** with the Clerk of the Court through Case Management/Electronic Filing System.

Jesse M. Sbaih (#7898)  
Ines Olevic-Saleh (#11431)  
JESSE SBAIH & ASSOCIATES, LTD.  
The District at Green Valley Ranch  
170 South Green Valley Parkway, Suite 280  
Henderson, Nevada 89012

[jsbaih@sbaihlaw.com](mailto:jsbaih@sbaihlaw.com)  
[iolevic@sbaihlaw.com](mailto:iolevic@sbaihlaw.com)

*Attorneys for Plaintiff*

By /s/ Anne Cordell  
An Employee of LEWIS BRISBOIS BISGAARD  
& SMITH LLP

**Archived:** Monday, November 30, 2020 1:57:57 PM

**From:** Teegarden, Tara

**Sent:** Monday, November 30, 2020 12:44:37 PM

**To:** Cordell, Anne

**Cc:** Grames, Cheryl; Freeman, Kristen

**Subject:** FW: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

**Response requested:** No

**Sensitivity:** Normal

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Hi Anne,

Can you please file the SAO? Thank you.

Tara

**Tara U. Teegarden**

**Attorney**

Las Vegas Rainbow

702.693.1716 or x7021716

---

**From:** Jesse Sbaih <jsbaih@sbaihlaw.com>

**Sent:** Monday, November 30, 2020 12:28 PM

**To:** Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com>

**Cc:** Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; Cordell, Anne <Anne.Cordell@lewisbrisbois.com>; Bradley-Estrada, Mary <Mary.Bradley-Estrada@lewisbrisbois.com>; Freeman, Robert <Robert.Freeman@lewisbrisbois.com>; Freeman, Kristen <Kristen.Freeman@lewisbrisbois.com>; Ines <iolevic@sbaihlaw.com>; Jennifer Davidson <jdavidson@sbaihlaw.com>

**Subject:** RE: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

Hi Tara...I hope you had a terrific Thanksgiving!

The draft SAO is fine. You may proceed with my e-signature.

Best regards,

Jesse M. Sbaih, Esq.

JESSE SBAIH & ASSOCIATES, LTD.

The District at Green Valley Ranch

170 South Green Valley Parkway, Suite 280

Henderson, Nevada 89012

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----- Original Message -----

Subject: RE: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

From: "Teegarden, Tara" <[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)>

Date: Mon, November 30, 2020 11:29 am

To: "Jesse Sbaih, Esq." <[jsbaih@sbaihlaw.com](mailto:jsbaih@sbaihlaw.com)>

Cc: "Grames, Cheryl" <[Cheryl.Grames@lewisbrisbois.com](mailto:Cheryl.Grames@lewisbrisbois.com)>, "Cordell, Anne"

<[Anne.Cordell@lewisbrisbois.com](mailto:Anne.Cordell@lewisbrisbois.com)>, "Bradley-Estrada, Mary"

<[Mary.Bradley-Estrada@lewisbrisbois.com](mailto:Mary.Bradley-Estrada@lewisbrisbois.com)>, "Freeman, Robert"

<[Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)>, "Freeman, Kristen"

<[Kristen.Freeman@lewisbrisbois.com](mailto:Kristen.Freeman@lewisbrisbois.com)>, Ines <[iolevic@sbaihlaw.com](mailto:iolevic@sbaihlaw.com)>,

Jennifer Davidson <[j davidson@sbaihlaw.com](mailto:j davidson@sbaihlaw.com)>

Good Morning,

Please find attached the draft SAO to extend the briefing schedule for your review. Please let me know if you have any edits you would like made. If not, do I have your permission to use your e-sig? Thank you.

Best regards,

Tara



Tara U. Teegarden

Attorney

[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)

T: 702.693.1716 F: 702.366.9563

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**From:** Jesse Sbaih, Esq. <[jsbaih@sbaihlaw.com](mailto:jsbaih@sbaihlaw.com)>

**Sent:** Wednesday, November 25, 2020 3:40 PM

**To:** Teegarden, Tara <[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)>

**Cc:** Grames, Cheryl <[Cheryl.Grames@lewisbrisbois.com](mailto:Cheryl.Grames@lewisbrisbois.com)>; Cordell, Anne

<[Anne.Cordell@lewisbrisbois.com](mailto:Anne.Cordell@lewisbrisbois.com)>; Bradley-Estrada, Mary <[Mary.Bradley-](mailto:Mary.Bradley-Estrada@lewisbrisbois.com)

[Estrada@lewisbrisbois.com](mailto:Estrada@lewisbrisbois.com)>; Freeman, Robert <[Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)>;

Freeman, Kristen <[Kristen.Freeman@lewisbrisbois.com](mailto:Kristen.Freeman@lewisbrisbois.com)>; Ines <[iolevic@sbaihlaw.com](mailto:iolevic@sbaihlaw.com)>;

Jennifer Davidson <[j davidson@sbaihlaw.com](mailto:j davidson@sbaihlaw.com)>

**Subject:** Re: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

My pleasure! Happy Thanksgiving!

Jesse M. Sbaih, Esq.

Sent from my iPhone

On Nov 25, 2020, at 3:31 PM, Teegarden, Tara  
<[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)> wrote:

We appreciate the extension and will forward a request to extend the briefing schedule for your review on Monday. Thanks again.



**Tara U. Teegarden**  
Attorney  
[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)  
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**From:** Jesse Sbaih <[jsbaih@sbaihlaw.com](mailto:jsbaih@sbaihlaw.com)>  
**Sent:** Wednesday, November 25, 2020 1:51 PM  
**To:** Teegarden, Tara <[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)>  
**Cc:** Grames, Cheryl <[Cheryl.Grames@lewisbrisbois.com](mailto:Cheryl.Grames@lewisbrisbois.com)>; Cordell, Anne <[Anne.Cordell@lewisbrisbois.com](mailto:Anne.Cordell@lewisbrisbois.com)>; Bradley-Estrada, Mary <[Mary.Bradley-Estrada@lewisbrisbois.com](mailto:Mary.Bradley-Estrada@lewisbrisbois.com)>; Freeman, Robert <[Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)>; Freeman, Kristen <[Kristen.Freeman@lewisbrisbois.com](mailto:Kristen.Freeman@lewisbrisbois.com)>  
**Subject:** [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

External Email

Sure!

Jesse M. Sbaih, Esq.  
JESSE SBIAH & ASSOCIATES, LTD.  
The District at Green Valley Ranch  
170 South Green Valley Parkway, Suite 280  
Henderson, Nevada 89012  
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----- Original Message -----

Subject: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline  
From: "Teegarden, Tara" <[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)>  
Date: Wed, November 25, 2020 1:38 pm

To: Jesse Sbaih <[jsbaih@sbaihlaw.com](mailto:jsbaih@sbaihlaw.com)>  
Cc: "Grames, Cheryl" <[Cheryl.Grames@lewisbrisbois.com](mailto:Cheryl.Grames@lewisbrisbois.com)>, "Cordell, Anne" <[Anne.Cordell@lewisbrisbois.com](mailto:Anne.Cordell@lewisbrisbois.com)>, "Bradley-Estrada, Mary" <[Mary.Bradley-Estrada@lewisbrisbois.com](mailto:Mary.Bradley-Estrada@lewisbrisbois.com)>, "Freeman, Robert" <[Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)>, "Freeman, Kristen" <[Kristen.Freeman@lewisbrisbois.com](mailto:Kristen.Freeman@lewisbrisbois.com)>

Good Afternoon Jesse,

Would you consider a one week extension to the briefing schedule for responding to Plaintiff's Motion for Partial Summary Judgment? This would leave us at a response date of December 16, 2020. Please let us know. Thank you.

Best regard,

Tara



**Tara U. Teegarden**  
Attorney  
[Tara.Teegarden@lewisbrisbois.com](mailto:Tara.Teegarden@lewisbrisbois.com)  
T: 702.693.1716 F: 702.366.9563

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